

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
AMARILLO DIVISION

DR. RONNY JACKSON, STUART and
ROBBI FORCE, and SARRI SINGER,

Plaintiffs,

v.

Case No. 2:22-CV-00241-Z

JOSEPH R. BIDEN, JR., et al,

Defendants.

NOTICE OF SUPPLEMENTAL AUTHORITY

The Plaintiffs, through their counsel, respectfully provide the Court with notice of a supplemental U.S. government authority bearing on the Defendants' traceability claim.

1. Attached is an advisory issued by the Office of Inspector General, United States Agency for International Development, after the government's announcement on October 18, 2023, that it is providing \$100 million in humanitarian assistance for Gaza and the West Bank. *See* OFF. OF THE INSPECTOR GEN., U.S. AGENCY FOR INT'L DEV., *Responsibility to Identify and Report Potential Diversion of U.S. Humanitarian Aid to Hamas and Other Foreign Terrorist Organizations* (Nov. 3, 2023), <http://oig.usaid.gov/sites/default/files/2023-11/Situational%20Alert%20-%20Diversion%20and%20Material%20Support.pdf> (available at <https://oig.usaid.gov/node/6393>).

2. It states that the USAID OIG "has identified this area [the West Bank and Gaza] as high-risk for potential diversion and misuse of U.S.-funded assistance"

by terrorists. It further states that terrorists divert U.S. aid through the systemic coercion of aid workers, imposition of taxes, duties, fees on USAID awardees and beneficiaries, and influence over beneficiary selection and “internally displaced persons camp management.” *Id.*; see also ECF No. 1 at ¶¶ 37-41.

Respectfully submitted,

/s/ Michael Ding

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CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2023, I electronically filed the Plaintiffs' Notice of Supplemental Authority in the United States District Court for the Northern District of Texas by using the CM/ECF system. Counsel in the case are registered CM/ECF users, and service will be accomplished by the CM/ECF system.

/s/ Michael Ding
Michael Ding